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1 Q -- as far as the main house?
2 A That isn't what I did.
3 Q Okay. Tell me what you did. I don't
4 understand what you did.
5 A Well, steel is put down. You pour concrete on
6 it.
7 Q Okay.
8 A The walls are formed.
9 Q Okay.
10 A Pour concrete in those.
11 Q Okay. Anything else?
12 A That's it.
13 Q Okay. Did you have anything to do with the
14 original roof construction of the main house?
15 A No.
16 Q Did you ever work on the roof of the main house
17 in any capacity, either maintenance, repair, or
18 otherwise?
19 A Yes.
20 Q What did you do with regard to the main roof?
21 A Fastened furrings and insulation.
22 Q As far as insulation, you mean installing
23 insulation?
24 A Semi-rigid polyisocyanurate insulation.
25 Q Okay.

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1 A That's between the furrings.
2 Q And describe what the furrings are. What does
3 that mean?
4 A Furrings are any type of wood that a roof
5 fastens to, generally a metal roof.
6 Q Do you know what period of time you were
7 working on the roof on the main house? In other
8 words, days? Months?
9 A No.
10 Q Do you know if it was more or less than six
11 months that you worked on the roof?
12 A I don't recall what time I was working on it.
13 Q Did you work on the roof of any of the other
14 buildings?
15 A Yes.
16 Q Was Phil still the contractor on the job when
17 you were doing the work on the roof of the main
18 house?
19 A No.
20 Q Was there any contractor on the job at that
21 point?
22 A No.
23 Q Did anyone assist you on any of the work you
24 did on the roof of the main house?
25 A Yes.

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1 Q Who?
2 A I'd rather not say.
3 Q Why is that?
4 A Because I don't want them to be deposed.
5 Q Okay. Well, that's not a valid reason.
6 A Okay. One guy is from Dominica. That's where
7 he lives.
8 Q What is that? Dominican Republic? I don't
9 know what Dominica is.
10 A Dominica is an island south. It's probably
11 closer to South America than it is anywhere else.
12 Q Okay. That's one person.
13 A And then another person is retired that lives
14 in St. John. All I know is his first name was
15 Kenny.
16 Q Kenny is the person who lives in St. John?
17 A Yeah.
18 Q And what's the other person's name? We don't
19 have time to depose anyone else in this case.
20 A Thomas Guiste, I think.
21 COURT REPORTER: Say the last name again.
22 THE WITNESS: G-U-I-S-T-E.
23 Q (By Mr. Cosby) Thomas is his first name?
24 A Yeah.
25 Q And what kind of work did Thomas perform on the

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1 roof?
2 A What I told him to do.
3 Q Which was what?
4 A What he was doing was pretty much screwing in
5 the furrings.
6 Q Was Thomas living on St. John at the time?
7 A Either St. John or St. Thomas. I don't
8 remember which.
9 Q And Kenny, what was his role as far as the main
10 house work?
11 A Actually, he didn't do anything on the roof.
12 Q Kenny? Kenny did not?
13 A No.
14 Q I just want to make sure this reads right
15 because I said Kenny did not, you said no. So did
16 Kenny work on the roof or not?
17 A No.
18 Q Did anyone else work on the roof of the main
19 house at your direction other than you --
20 A No.
21 Q -- or Thomas? No?
22 A No.
23 Q Was there ever a contractor working on the
24 property that had workers on the property while you
25 were there other than Phil?